



MICHAEL A. CARDOZO  
Corporation Counsel

THE CITY OF NEW YORK  
LAW DEPARTMENT  
100 CHURCH STREET  
NEW YORK, N.Y. 10007-2601

DEBORAH I. MEYER  
Assistant Corporation Counsel  
Special Federal Litigation Division  
Room 3-217  
(212) 788-0963  
Fax (212) 788-9776

October 12, 2004

**By Fax**

Honorable Roann L. Mann  
United States Magistrate Judge  
United States Courthouse  
Eastern District of New York  
225 Cadman Plaza East  
Brooklyn, N.Y. 11201

*Application granted,  
on consent. Fact discovery  
is extended to 1/18/05.  
The 10/26/04 settlement  
conference is adjourned  
to 2/11/05 at 2:00 p.m.  
SO ORDERED: Roanne  
L. Mann  
U.S.M.J.  
10/13/04*

Re: Sharless Thompson & Christopher Robinson v. City of New York et al.  
03 CV 04208 (ILG) (RLM)

Your Honor:

I am the attorney representing the defendants. Defendants' respectfully request a ninety (90) day extension of the discovery deadline from October 18, 2004, to and including January 18, 2005. In addition, should your Honor grant this request, defendants' further respectfully request that the October 26, 2004 conference be adjourned to a date and time after the close of discovery that is convenient to the Court. This is defendants' first request for an extension of the discovery deadline. Plaintiffs' counsel consents to this extension.

The reason for this request for an extension is due to the fact that I will be away from the office on leave from October 25, 2004 until December 10, 2004. During that time I will be in North Carolina-Fort Bragg with my fiancé who is a Captain in the United States Army and is being deployed to Iraq for at least 1 year. In order to not cause any undue hardship to my office or delays in any of my cases I will be making every effort to work via computer and telephone while in North Carolina.

At this time, plaintiff's counsel and I have begun settlement negotiations and we will be able to continue them while I am in North Carolina. The parties are making every effort to complete document discovery before October 25, 2004. From the defendants' perspective, the

detective's investigation file underlying the incident has been located and will be produced. Accordingly, this enlargement of time will allow me to take the necessary leave, while simultaneously allowing sufficient time for the parties to continue their settlement negotiations and complete depositions.

Accordingly, defendants respectfully request that the discovery deadline be extended ninety (90) days to and including January 18, 2005, and that the Court adjourn the conference scheduled for October 26, 2004 until a date and time after the close of discovery. I can be available by telephone for a conference in November or early December if the Court is so inclined.

Thank you for your consideration of this request.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Deborah I. Meyer".

Deborah I. Meyer (DM 0931)  
Assistant Corporation Counsel  
Special Federal Litigation Division

cc: Amy Marion, Esq.  
Attorney for Plaintiffs  
(By Fax)